

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

2004 SEP 30 P 3: 56

JEREMY RATLIFF,

Plaintiff,

v.

Case No.: 03-60015

HON. MARIANNE O. BATTANI

MICHIGAN DEPARTMENT OF
CORRECTIONS, ANTHONY SIMMONS,

Defendants.

LAW OFFICES OF McCALL & TRAINOR
CHRISTOPHER J. TRAINOR (P42449)
Attorney for Plaintiff
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Attorney for Defendants
Corrections Division
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VERDICT FORM

Assault & Battery

1. Did the Defendant commit a battery against JEREMY RATLIFF by putting into motion the cell door that hit JEREMY RATLIFF in the face?

YES _____

NO X

If you answered "YES" to question 1, proceed to question 2.

If you answered "NO" to question 1, proceed to question 4.

2. Was the battery committed by Defendant a proximate cause of JEREMY RATLIFF'S injuries?

YES _____

NO _____

If you answered "YES," proceed to question 3.

If you answered "NO," proceed to question 4.

3. Because JEREMY RATLIFF suffered a battery as a result of Defendant's actions, state the dollar amount of compensatory damages that will reasonably compensate JEREMY RATLIFF for the extensive injuries he suffered.

DOLLAR AMOUNT \$ _____

Please proceed to question 4.

Gross Negligence

4. Was the act of Defendant slamming a door in JEREMY RATLIFF'S face so reckless as to demonstrate a substantial lack of concern for Plaintiff's safety?

YES X NO _____

If you answered "YES," proceed to question 5.

If you answered NO," proceed to question 7.

5. Were the actions of Defendant the proximate cause of JEREMY RATLIFF'S injuries?

YES X NO _____

If you answered "YES," proceed to question 6.

If you answered "NO," proceed to question 7.

6. As a result of Defendant's gross negligence, state the dollar amount of compensatory damages that will reasonably compensate JEREMY RATLIFF for the extensive injuries he suffered.

DOLLAR AMOUNT

\$ 62,000

Please proceed to question 7.

Eighth Amendment

7. Did Defendant violate the Eighth Amendment to the United States Constitution's prohibition against cruel and unusual punishment by using excessive force against JEREMY RATLIFF?

YES _____

NO X

If you answered "YES," proceed to question 8.

If you answered "NO," proceed to question 10.

8. Were Defendant's actions a proximate cause of the injuries suffered by JEREMY RATLIFF?

YES _____

NO _____

If you answered "YES," proceed to question 9.

If you answered "NO," proceed to question 10.

9. As a result of Defendant's violation of the Eighth Amendment using excessive force on JEREMY RATLIFF, state the dollar amount of compensatory damages that will reasonably compensate JEREMY RATLIFF for the injuries he suffered.

DOLLAR AMOUNT \$ _____

Damages

10. State the total amount of damages awarded to JEREMY RATLIFF as a result of Defendant's actions.

DOLLAR AMOUNT

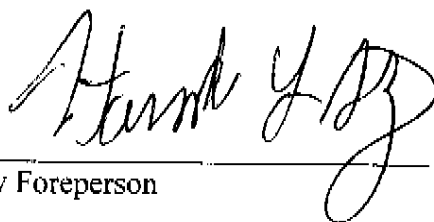
\$ 62,000

Punitive Damages

11. As a result of Defendant's reckless indifference to JEREMY RATLIFF'S constitutional rights, state in dollars the amount of punitive damages JEREMY RATLIFF is entitled to recover.

DOLLAR AMOUNT

\$ 0



Jury Foreperson